Subject	Nov. 2012	Feb. 2013	April 2013	May 2013	July 2013
Matter			r		
Use of informants	Refers to two informants, CHS 11 and CHS 12. Refers also to CHS 13, who is not useable in the investigation.	Refers to two informants, CHS 11 and CHS 12.	Refers to two informants, CHS 11 and CHS 12.	Refers to two informants, CHS 11 and CHS 12.	Refers to two informants, CHS 11 and CHS 12.
CHS 11	Will be in a position to develop information on Target Subjects and interceptees, but only to the same extent as the undercover operation is able to develop that information.	Has had extensive communication with certain Target Subjects and Interceptees. However, does not have access or the ability to penetrate to conversations that Jackson and other intermediaries have with public officials on behalf of CHS 11.	Has had extensive communication with certain Target Subjects and Interceptees. However, does not have access or the ability to penetrate to conversations that Jackson and other intermediaries have with public officials on behalf of CHS 11.	Has had extensive communication with certain Target Subjects and Interceptees. However, does not have access or the ability to penetrate to conversations that Jackson and other intermediaries have with public officials on behalf of CHS 11.	Has had extensive communicatio n with certain Target Subjects and Interceptees. However, does not have access or the ability to penetrate to conversations that Jackson and other intermediaries have with public officials on behalf of CHS 11.
CHS 12	Has had no independent contact with any Target Subjects and Interceptees outside of interaction with UCE.	CHS 12 has not provided any substantial contact since the November 13, 2012 Quinn Affidavit.	CHS 12 has not provided any substantial contact since the November 13, 2012 Quinn Affidavit.	CHS 12 has not provided any substantial contact since the November 13, 2012 Quinn Affidavit.	CHS 12 has not provided any substantial contact since the November 13, 2012 Quinn Affidavit.
Use of undercover Agents	Statement that despite their success, UCEs cannot be used to fully achieve	Statement that despite their success, UCEs cannot be used to fully achieve	Statement that despite their success, UCEs cannot be used to fully achieve	Statement that despite their success, UCEs cannot be used to fully achieve all	Statement that despite their success, UCEs cannot be used to

	all of the goals of the investigation absent interception of wire and electronic communication s over the Target Telephones.	all of the goals of the investigation absent interception of wire and electronic communication s over the Target Telephones.	all of the goals of the investigation absent interception of wire and electronic communication s over the Target Telephones.	of the goals of the investigation absent interception of wire and electronic communications over the Target Telephones.	fully achieve all of the goals of the investigation absent interception of wire and electronic communications over the Target Telephones.
Interviews of Witnesses	Statement that Chow and have been considered and rejected as a cooperating witnesses, and no others can provide information or evidence.	Statement that Chow and have been considered and rejected as cooperating witnesses, and no others can provide information or evidence.	Statement that Chow and have been considered and rejected as cooperating witnesses, and no others can provide information or evidence.	Statement that Chow and have been considered and rejected as cooperating witnesses and no others can provide information or evidence.	Statement that Chow and have been considered and rejected as cooperating witnesses and no others can provide information or evidence.
Physical Surveillanc e	Based on my training and experience, physically surveillance has significant limitations. Physical surveillance is a useful investigative tactic that has been employed with some limited success in this investigation and will continue to be so employed-primarily to corroborate the	a useful investigative tactic that has been employed with some limited success in this investigation and will continue to be so employed-primarily to	Based on my training and experience, physically surveillance has significant limitations. Physical surveillance is a useful investigative tactic that has been employed with some limited success in this investigation and will continue to be so employed-primarily to corroborate the	useful investigative tactic that has been employed with some limited success in this investigation and will continue to be so employed- primarily to corroborate the	Based on my training and experience, physically surveillance has significant limitations. Physical surveillance is a useful investigative tactic that has been employed with some limited success in this investigation and will continue to be so employed-primarily to

	communication s being intercepted. However, absent interception of wire and electronic communication s over the Target Telephones, physical surveillance on its own will not fully achieve the goals of the investigation.	wire and electronic communication s over the Target Telephones, physical surveillance on its own will not fully achieve the goals of the investigation.	communication s being intercepted. However, absent interception of wire and electronic communication s over the Target Telephones, physical surveillance on its own will not fully achieve the goals of the investigation.	communications over the Target Telephones, physical surveillance on its own will not fully achieve the goals of the investigation.	ns being intercepted. However, absent interception of wire and electronic communications over the Target Telephones, physical surveillance on its own will not fully achieve the goals of the investigation.
Pole Cameras	Absent interception of wire and electronic communication s over the Target Telephones, I believe the use of Pole Cameras will not fully achieve the goals of the investigation.	in the November 2012 Quinn Affidavit. I have reconsidered the use of pole cameras and remain	Pole Cameras were addressed in the November 2012 and February 2013 Quinn Affidavits. I have reconsidered the use of pole cameras and remain convinced that they present the same limitations and challenges as they did in February 2013. Absent interception of wire and electronic communication	in the November 2012, February 2013 and April 2013 Quinn Affidavits. I have reconsidered the use of pole cameras and remain convinced that they present the same limitations and challenges as they did in April 2013. Absent interception of wire and electronic communications over the Target	and challenges as they did in

		Target Telephones, I believe the use of Pole Cameras will not fully achieve the goals of the investigation.	s over the Target Telephones, I believe the use of Pole Cameras will not fully achieve the goals of the investigation.	believe the use of Pole Cameras will not fully achieve the goals of the investigation.	interception of wire and electronic communicatio ns over the Target Telephones, I believe the use of Pole Cameras will not fully achieve the goals of the investigation.
Telephone Records Analysis	Telephone records cannot alone establish proof of the criminal activities under investigation. For example, the pattern of calls between the Target Subjects and Interceptees shows, at best circumstantial evidence of their involvement in criminal activities.	Telephone records cannot alone establish proof of the criminal activities under investigation. For example, the pattern of calls between the Target Subjects and Interceptees shows, at best circumstantial evidence of their involvement in criminal activities.	Telephone records cannot alone establish proof of the criminal activities under investigation. For example, the pattern of calls between the Target Subjects and Interceptees shows, at best circumstantial evidence of their involvement in criminal activities.	alone establish proof of the criminal activities under investigation. For example, the pattern of calls between the Target Subjects and Interceptees shows, at best circumstantial evidence of their involvement in criminal	Telephone records cannot alone establish proof of the criminal activities under investigation. For example, the pattern of calls between the Target Subjects and Interceptees shows, at best circumstantial evidence of their involvement in criminal activities.
Trash Searches	Trash searches are highly unlikely to fully achieve the goals of this investigation	Trash searches are highly unlikely to fully achieve the goals of this investigation	Trash searches are highly unlikely to fully achieve the goals of this investigation	Trash searches are highly unlikely to fully achieve the goals of this investigation	Trash searches are highly unlikely to fully achieve the goals of this investigation
Mail Covers	To date, while the	To date, while the	To date, while the	To date, while the investigation	To date, while the

	investigation	investigation	investigation	has revealed the	investigation
	has revealed the	has revealed	has revealed	use of the mail to	has revealed
	use of the mail	the use of the	the use of the	further the	the use of the
	to further the	mail to further	mail to further	conspiracy, the	mail to further
	conspiracy, the	the conspiracy,	the conspiracy,	investigation has	the
	investigation	the	the	not revealed the	conspiracy,
	has not revealed	investigation	investigation	use of mailings	the
	the use of	has not	has not	between the co-	investigation
	mailings	revealed the	revealed the	conspirators as a	has not
	between the co-	use of mailings	use of mailings	manner of them	revealed the
	conspirators as	between the	between the	communicating	use of
	a manner of	co-conspirators	co-conspirators	about the	mailings
	them	as a manner of	as a manner of	conspiracy and	between the
	communicating	them	them	Target Offenses.	co-
	about the	communicating	communicating	Furthermore,	conspirators
	conspiracy and	about the	about the	demonstrating a	as a manner
	Target	conspiracy and	conspiracy and	connection	of them
	Offenses.	Target	Target	between the co-	communicatin
	Furthermore,	Offenses.	Offenses.	conspirators and	g about the
	demonstrating a	Furthermore,	Furthermore,	Target Subjects	conspiracy
	connection	demonstrating	demonstrating	and Interceptees	and Target
	between the co-	a connection	a connection	would not reveal	Offenses.
	conspirators and	between the	between the	the contents of	Furthermore,
	Target Subjects	co-conspirators	co-conspirators	those	demonstrating
	and Interceptees	and Target	and Target	communications.	a connection
	would not	Subjects and	Subjects and		between the
	reveal the	Interceptees	Interceptees		co-
	contents of	would not	would not		conspirators
	those	reveal the	reveal the		and Target
	communication	contents of	contents of		Subjects and
	S.	those	those		Interceptees
		communication	communication		would not
		S.	S.		reveal the
					contents of
					those
					communicatio
					ns.
Grand Jury	While Grand	I have also	I have also	I have also	I have also
Subpoenas	Jury subpoenas	considered	considered	considered using	considered
•	for financial	using the grand	using the grand	the grand jury to	using the
	records have	jury to secure	jury to secure	secure the	grand jury to
	been used with	the testimony	the testimony	testimony of	secure the
	limted success,	of certain of	of certain of	certain of the	testimony of
	I do not believe				certain of the
	that they can be		Subjects and	and	Target
	used to fully	Interceptees	Interceptees	Interceptees	Subjects and
	I do not believe that they can be	the Target Subjects and	the Target Subjects and	Target Subjects and	certain of the Target

achieve all of the goals of this investigation. I have also considered using the grand jury to secure the testimony of Jackson, and , who at this time are the only individuals of whom I am aware who may have sufficient knowledge Yee and and their potential associated criminal activities. However believe that it is reasonably likely that those individuals would invoke their Fifth Amendment testimonial privilege and refuse to testify. My experience, as well as that of other law enforcement officials, leads me to believe that an extensive overt investigation of any type would likely cause the subjects of this however, believe that it is reasonably likely that these individuals would invoke their Fifth Amendment testimonial privilege and refuse to testify. My experience, as well as that of other law enforcement officials, leads me to believe that an extensive overt investigation of any type would likely cause the subjects of this investigation to further conceal their illegal activities, making the ultimate detection and prosecution more difficult or impossible.

however, believe that it reasonably is likely that these individuals would invoke their Fifth Amendment testimonial privilege and refuse to testify.

My experience, as well as that of other law enforcement officials, leads me to believe that extensive overt investigation of any type would likely cause the subjects of this investigation to further conceal their illegal activities, making the ultimate detection and prosecution more difficult or impossible.

however, I believe that it is reasonably likely that these individuals would invoke their Fifth Amendment testimonial privilege and refuse to testify.

My experience, as well as that of other law enforcement officials, leads me to believe that an extensive overt investigation of any type would likely cause the subjects of this investigation to further conceal their illegal activities, making the ultimate detection and prosecution more difficult or impossible.

Interceptees... however, believe that it is reasonably likely that these individuals would invoke their Fifth Amendment testimonial privilege and refuse to testify.

My experience, as well as that of other 1aw enforcement officials, leads me to believe that an extensive overt investigation of any type would likely cause the of subjects this investigation to further conceal their illegal activities, making the ultimate detection and prosecution more difficult or impossible.

Case 3:14-cr-00196-CRB Document 1016-1 Filed 09/18/15 Page 7 of 7

	investigation to				
	further conceal				
	their illegal				
	activities,				
	making the				
	ultimate				
	detection and				
	prosecution				
	more difficult				
	or impossible.				
Search	It is unlikely	It is unlikely	It is unlikely	It is unlikely that	It is unlikely
Warrants	that the use of	that the use of	that the use of	the use of search	that the use of
	search warrants,	search	search	warrants, in and	search
	in and of	warrants, in	warrants, in	of themselves,	warrants, in
	themselves,	and of	and of	would fully	and of
	would fully	themselves,	themselves,	achieve the goals	themselves,
	achieve the	would fully	would fully	of this	would fully
	goals of this	achieve the	achieve the	investigation.	achieve the
	investigation.	goals of this	goals of this		goals of this
		investigation.	investigation.		investigation.